

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**CHARLES JOSEPH HOOD**

)  
) **Criminal Case No. 5 : 2 2 - cr - 0 3**  
)  
) **In violation of:**  
)  
) **18 U.S.C. §§ 924(c), 2113(a) & (d)**  
)

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

***Armed Bank Robbery***

1. On or about January 4, 2022, in the Western District of Virginia, the defendant, CHARLES JOSEPH HOOD, by force and violence, and by intimidation did take from the person and presence of another, namely employees of the First Citizens Bank located at 320 University Blvd, Harrisonburg, Virginia, approximately \$15,908.00 in money belonging to and in the care, custody, control, management, and possession of the First Citizens Bank, a bank for which the deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendant, CHARLES JOSEPH HOOD, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

2. All in violation of Title 18, United States Code, Sections 2113(a) & (d).

**COUNT TWO**

***Brandishing a Firearm During and In Relation to a Crime of Violence***

3. On or about January 4, 2022, in the Western District of Virginia, the defendant, CHARLES JOSEPH HOOD, knowingly brandished, carried, and used a firearm, during and in relation to, and possessed in furtherance of, a crime of violence for which he may be prosecuted

in a court of the United States, as charged in Count One, that is, bank robbery, in violation of Title 18, United States Code, Sections 2113(a) and (d).

4. At the time the defendant, CHARLES JOSEPH HOOD, committed this offense, he had previously been convicted of a violation of Title 18, United States Code, Section 924(c)(1)(A).

5. All in violation of Title 18, United States Code, Section 924(c)(1)(A) & (c)(1)(C).

**NOTICE OF FORFEITURE**

6. Upon conviction of the offense alleged in Count One, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The United States will seek a forfeiture money judgment against the defendant in the amount equal to the value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of this offense.

7. Upon conviction of the offenses alleged in Count Two, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28 United States Code, Section 2461, any firearm or ammunition involved in or used in any knowing violation of the offense.

8. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

9. Criminal Forfeiture, pursuant to Title 18, United States Code, Sections 924(d), 981(a)(1)(C), Title 21, United States Code, Sections 853(p), and Title 28, United States Code, Section 2461.

A TRUE BILL, this 23<sup>rd</sup> day of March 2022.

/s/FOREPERSON  
FOREPERSON

  
CHRISTOPHER R. KAVANAUGH  
UNITED STATES ATTORNEY